

UNITED STATES DISTRICT COURT RECEIVED

for the

JUN 15 2020

Northern District of Iowa

Division

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF IOWA

JUSTIN PAUL SULZNER -
CHRISTIAN CONGREGATION OF JEHOVAH'S
WITNESSES (CCJW)
WATCHTOWER BIBLE & AND TRACT SOCIETY INC

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint.
If the names of all the plaintiffs cannot fit in the space above,
please write "see attached" in the space and attach an additional
page with the full list of names.)

-v-

UNITED STATES INTELLIGENCE AGENCY
ODNI - OFFICE OF DEPARTMENT NATIONAL
INTELLIGENCE AND ITS
DIRECTORS, ASST. DIRECTORS AND SUBORDIN.

Defendant(s)

(Write the full name of each defendant who is being sued. If the
names of all the defendants cannot fit in the space above, please
write "see attached" in the space and attach an additional page
with the full list of names.)

Case No.

20 cv 61 CJW-MAR
(to be filled in by the Clerk's Office)

COMPLAINT AND REQUEST FOR INJUNCTION

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	JUSTIN PAUL SULZNER
Street Address	1834 1st AVENUE NE - #104
City and County	CEDAR RAPIDS
State and Zip Code	IOWA 52402
Telephone Number	319-213-7608
E-mail Address	justinsulzner@gmail.com

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name	ODNI - OFFICE OF DEPARTMENT NATIONAL INTELLIGENCE-
Job or Title <i>(if known)</i>	ITS DIRECTORS, ASST. DIRECTORS AND SUBORDINATES
Street Address	
City and County	WASHINGTON D.C.
State and Zip Code	20511
Telephone Number	
E-mail Address <i>(if known)</i>	

Defendant No. 2

Name	
Job or Title <i>(if known)</i>	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address <i>(if known)</i>	

Defendant No. 3

Name	
Job or Title <i>(if known)</i>	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address <i>(if known)</i>	

Defendant No. 4

Name	
Job or Title <i>(if known)</i>	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address <i>(if known)</i>	

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*

☒ Federal question ☐ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

Bivens v. Six Unknown Named Agents, 403 U.S. 388 (1971)
1st and 14th Amendments

B. If the Basis for Jurisdiction Is Diversity of Citizenship**1. The Plaintiff(s)****a. If the plaintiff is an individual**

The plaintiff, *(name)* JUSTIN PAUL SULZNER, is a citizen of the
State of *(name)* IOWA.

b. If the plaintiff is a corporation

The plaintiff, *(name)* _____, is incorporated
under the laws of the State of *(name)* _____,
and has its principal place of business in the State of *(name)* _____.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)**a. If the defendant is an individual**

The defendant, *(name)* _____, is a citizen of
the State of *(name)* _____. Or is a citizen of
(foreign nation) _____.

b. If the defendant is a corporation

The defendant, *(name)* _____, is incorporated under the laws of the State of *(name)* _____, and has its principal place of business in the State of *(name)* _____.

Or is incorporated under the laws of *(foreign nation)* _____, and has its principal place of business in *(name)* _____.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because *(explain)*:

THE ACTIONS OF THE DEFENDANT HAVE BEEN EXTREMELY HARMFUL AND EGREGIOUS TO THE PLAINTIFF(S).

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the injunction or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

A. Where did the events giving rise to your claim(s) occur?

SEE ATTACHED PLEADING DOCUMENTATION

B. What date and approximate time did the events giving rise to your claim(s) occur?

SEE ATTACHED PLEADING DOCUMENTATION

- C. What are the facts underlying your claim(s)? *(For example: What happened to you? Who did what? Was anyone else involved? Who else saw what happened?)*

SEE ATTACHED PLEADING DOCUMENTATION

IV. Irreparable Injury

Explain why monetary damages at a later time would not adequately compensate you for the injuries you sustained, are sustaining, or will sustain as a result of the events described above, or why such compensation could not be measured.

THE ALLEGED HARMFUL ACTIONS CANNOT BE REPAIRED DUE TO THE TIME SPAN, SCOPE AND VAST EXTENT OF THIS INTELLIGENCE OPERATION.

V. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

PRELIMINARY AND PERMANENT INJUNCTIVE RELIEF REQUESTED IN ATTACHED PLEADING. RELIEF CONCERNING MONEY DAMAGES WILL BE ADDRESSED UPON CONSULTATION WITH AN ATTORNEY.

VI. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 06/15/2020

Signature of Plaintiff

Printed Name of Plaintiff

Justin P. Sulzner
JUSTIN PAUL SULZNER

B. For Attorneys

Date of signing: _____

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address

Leave with a staff member, or mail to:

ACLU of Iowa (Attn: Legal Intake), 505 Fifth Ave., Ste. 808, Des Moines, IA 50309



AMERICAN CIVIL LIBERTIES UNION
of IOWA

FOUNDATION

LEGAL PROGRAM

For Legal Complaints, please provide the following information and a member of our staff will be in touch with you at our earliest opportunity.

NAME:	Justin Sulzner
ADDRESS:	9140 K Avenue
DAYTIME PHONE:	563-260-0656 (now 319-213-7608)
EMAIL:	daytrader3200@yahoo.com (do not use for confidential)
BRIEF DESCRIPTION (Please provide a brief description of your concern or complaint here. The more specific you can be the better.):	<p>For over 65 years the USIA United States Intelligence Agency - CIA, NSA and ^{put} others have been engaged in a ^{slow} systematic effort to recruit thousands of individuals and spent billions of dollars for people to pose as Fake Jehovah's Witnesses in predominately English speaking congregations around the world.</p> <p>This is equivalent to a 21st century modern day Holocaust in which the goal is the state sponsored elimination of the CCJW (Christian Congregation of Jehovah's Witnesses)</p> <p>These recruited "Fake Jehovah's Witnesses" come from all walks of life: Farmers, mechanics, government workers, electricians etc.</p>

multi-generation

They Are paid ~~by~~ by USIA to portray every conceivable Family life situation within a normal congregation of Jehovah's Witnesses ie: Strong parents with spiritually weak children. or vice-versa, some with unbelieving mate some whose family has "disowned" them for becoming one of "Jehovah's Witnesses"

~~One~~ One of the goals of these USIA impostors is to occupy key positions within the CCJW such as Heads of Branch Offices, Circuit Overseers, Service Committees and elder bodys. However there are others who appear to be common publishers within CCJW. Some even pose as "interested ones" (they may study the Bible on and off and attend the CCJW regularly in their locale)

Another goal of these USIA impostors is to quietly promote a morality that is contrary to the Biblical standards taught by the CCJW. Adultery and fornication are practiced and it is not uncommon, It is practiced in a very secretive manner.

The primary goal of these USIA impostors is to remain in the congregation until the last true Jehovah's Witness either leaves the area, gives up attending or dies. The "congregation" is then dissolved, the Kingdom Hall is sold. The area that surrounds it becomes unassigned and the door-to-door preaching work there ceases. This scenario has played out hundreds of times throughout the world.

Under the FOIA, please provide answers to the following questions:

1. Is the funding of this USIA operation coming directly from USIA or is it channelled through another "third party organization" (such as the United Nations?)
2. What is the average amount USIA pays an individual in compensation to perpetuate this despicable fraud?
3. Besides ^{the U.S.} Canada, Mexico, Spain, Phillipines, Tonga and Bolivia, what other countries is this fraud being perpetuated by individuals working for USIA?
4. Please identify (if any) members of the Governing Body of Jehovah's Witnesses who are currently working for USIA or a third party organization. A list has been provided. The Address is: Warwick, New York
5. Please provide a complete list by name, alphabetically, state ^{territory} or congregation of the individuals currently working for USIA in the manner described herein.
6. Please provide a complete list by name, alphabetically, state ^{territory} or congregation of the individuals ~~currently~~ working for USIA who are now deceased.
7. Please identify any other religions in which a similar program is being carried out by USIA. ^{besides SCW}
8. Since my personal phone, computers, and wireless router have been under constant surveillance by USIA, please provide me with the name of the person who authorized this or the agent order directing the surveillance.

March 16th, 2020

National Security Agency
ATTN: Acting Chief, FOIA Office
Ft. George G. Meade, Maryland 20755-6000

RE: FOIA 107947

Dear Sharon Linkous:

I did not receive your letter via USPS dated September 12th, 2019. The time has passed for an appeal, therefore I am requesting that you read the following:

NSA did not really answer any of my questions concerning the FOIA that I sent in September, 2019 and in March 2020. NSA claimed they addressed those questions under Request 107947. They did not.

In that FOIA, NSA simply told me what their "two-fold mission" is. Thank you for that information, but it does not address the questions I asked. It simply tells me what NSA does and what your mission is, implying that my requests do not fall within your mission and the questions are therefore unanswerable. That is deceptive.

This request may deal with intelligence operations that fall outside NSA's mission and NSA may be conducting an operation that does NOT fall within that mission. I am confident we all are well aware that NSA has engaged in these types of missions on several occasions in the past.

PLEASE READ AND ANSWER THESE QUESTIONS CAREFULLY:

1. Is NSA aware of the intelligence community currently operating within the congregations of Jehovah's Witnesses within the U.S. and other countries throughout the world?
2. Is NSA providing "solutions, products and services and/or intelligence processing" for the intelligence community currently operating in congregations of Jehovah's Witnesses in the U.S. and throughout the world?
3. Is NSA assisting another ODNI agency or organization in providing "solutions, products, services and/or intelligence processing" for the intelligence community currently operating within the congregations of Jehovah's Witnesses in the U.S. and throughout the world?

4. How many individual operatives are a part of this multi-national intelligence operation?
5. How long has this intelligence operation been active and what is the budget breakdown? (including but not limited to personnel costs)
6. What are the goals that the intelligence agency sought by developing this intelligence community within the congregations of Jehovah's Witnesses throughout the world?

Again, If my request is denied in whole or part, please justify all deletions and I expect the agency to release all segregable portions of otherwise exempt material.

I am willing to pay up to \$50.00 for this information

Thank you for your keen attention to this matter.

Justin Sulzner
1834 1st Avenue - #104
Cedar Rapids, Iowa 52402
319-213-7608

September 10th, 2019 , February 23rd, 2020 , and April 16th, 2020

Dear ODNI FOIA Officer:

1. I am formally requesting all documents ODNI has generated which has provided "guidance", "oversight" and "intelligence integration" to the U.S. intelligence community currently operating within U.S. congregations of Jehovah's Witnesses.
2. Please provide the documents of the agency or agencies under ODNI direction that explain how ODNI is currently directing the behaviour of individuals within the intelligence community (behaviour, actions, problems that arise, policies) now operating within Jehovah's Witnesses congregations in the United States and other countries.
3. Please provide the documentation records of the length of time this intelligence community has been operating, the budget, and the budget breakdown, number of members, (including but not limited to, personnel costs).
4. Please provide the documents stating the goals that the intelligence agency(s) sought to accomplish by placing these intelligence individuals (community) within the congregations of Jehovah's Witnesses throughout the U.S.
5. Please provide the documents that show U.S. intelligence communities are currently operating in the same fashion that ODNI is directing or providing oversight to these intelligence communities within other religions.
6. Please provide the documents, if any, to show ODNI is working in conjunction with the United Nations in directing or providing oversight to these intelligence communities within religions.

Disclosure of the requested information to me is in the public interest because it is likely to contribute significantly to public understanding of the operations or activities of the government and is not primarily in my commercial interest.

If my request is denied in whole or part, I ask that ODNI justify all deletions by reference to specific exemptions of the act. I will also expect ODNI to release all segregable portions of otherwise exempt material.

Justin Paul Sulzner - 1834 1st Avenue NE - Cedar Rapids, Iowa 52402



March 17, 2020

Justin Sulzner
1834 First Avenue NE # 104
Cedar Rapids IA 52402

Requester Justin Sulzner--

I am writing in response to your Freedom of Information Act request of February 12, 2020, for records in the custody of the National Archives and Records Administration. Your request was received in this office on February 20, 2020 and assigned FOIA tracking number 63908.

You requested access to case file numbers **44-HQ-73781**, **61-CG-525**, **61-HQ-1053**, **100-DL-196**, and **100-DL 6191**, identified by the FBI as potentially responsive to your request for records relating to **Jehovah's Witnesses**. My initial assessment confirms that only three of the files contain references to Jehovah's Witnesses:

1. Case file 44-HQ-73781 is on Members of the Jehovah's Witnesses in Puerto Rico. The file is arranged in a single section and contains 17 pages. This file is available for public use; 16 pages have been released in full, and one page has been redacted for privacy information of individuals who may still be living under 5 USC 552 (b)(6). Because of the small number of pages, I have included a copy.
2. Case file 61-CG-525 is on Jehovah's Witnesses. The file is arranged in a single subsection and contains an estimated 400 pages compiled as part of a treason investigation conducted between June 1940 and September 1963.
3. Case file 61-HQ-1053 is on the International Bible Students Association and was later on Jehovah's Witnesses. The file is arranged in 71 sections and has an estimated 13,200 pages, compiled as part of a treason investigation conducted between November 1921 and January 1977.

In two of the case files, I did not see any mention of Jehovah's Witnesses:

1. Case file 100-DL-196 is on the American Civil Liberties Union. The file is arranged in a single section and contains approximately 50 pages, compiled as part of an internal security investigation conducted between June 1940 and June 1968.
2. Case file 100-DL-6191 is on Communist Literature Found in a Well Near Ennis, Texas. The file is arranged in a single subsection and contains approximately 40 pages, compiled as part of an internal security investigation conducted in 1943.

Case files 61-CG-525, 61-HQ-1053, 100-DL-196, and 100-DL 6191 require screening for categories of information exempted from disclosure under the terms of the Freedom of Information Act, prior to public release. In particular, there are documents that may be redacted to

protect the identities of confidential sources, including FBI informant codes and informant file numbers.

These files together total a necessary **review of approximately 13,700 pages**. Requests for FBI case files that exceed 3,000 pages are assigned to our **third-tier processing queue**. You will receive a response in partial fulfillment of your request after we have completed the first increment. We will provide you with an update on the status of your request and an estimated completion date at that time. To give you an indication of our existing backlog, we are currently processing requests received in August 2013.

If you would like to discuss **narrowing your request**, please contact me directly at 301-837-0604 or amanda.weimer@nara.gov. I would be happy to assist you in narrowing the focus of your request to below 700 pages, in order to move your request to a much faster review queue.

Please note that once we have notified you that we have completed the first increment, you may either visit our College Park, MD facility to view the file at no cost or order a reproduction. You may order a reproduction copy at the cost of \$0.80 per page by contacting our office to place an order. We estimate that **the cost of a reproduction of the total file will be \$10,960**.

Due to COVID-19 **all National Archives research rooms nationwide are closed to the public** until further notice. Please monitor NARA's website at www.archives.gov for any change in status. Follow the National Archives on Facebook and on Twitter for immediate updates. For the present, you still have the option to order a copy of the records once review is complete.

To notify this office of a change in your contact information or to track the status of your request, please telephone 301-837-3190 or e-mail specialaccess_foia@nara.gov. If you have specific questions regarding the subject of your request, please contact me directly at 301-837-0604 or amanda.weimer@nara.gov. All communications concerning this request should reference your FOIA tracking number 63908. If this communication is returned as undeliverable and no return address is provided, your case will be administratively closed.

If you are not satisfied with our action on this request and would like the opportunity to discuss our response, you may contact our FOIA Public Liaison for assistance:

Accessioned Executive Branch Records – Washington, DC Area
FOIA Requester Service Center: 301-837-3190
FOIA Public Liaison: Lynn Goodsell (Acting)
8601 Adelphi Road, Room 5500
College Park, MD 20740-6001
Telephone: 301-837-3190
E-mail: dc.foia.liaison@nara.gov

If you are not satisfied with our action on this request, you have the right to file an administrative appeal within ninety (90) calendar days from the date of this letter. Appeals must be in writing and may be delivered by regular U.S. mail or by email. By filing an appeal, you preserve your rights under the Freedom of Information Act and present the deciding agency with an opportunity to review your request and reconsider its decision. If you submit your appeal by regular mail, it should be addressed to the Deputy Archivist of the United States (ND), National Archives and Records Administration, 8601 Adelphi Road, Room 4200, College Park, Maryland 20740-6001. Both the letter and envelope should be clearly marked "FOIA Appeal" if you submit your appeal by email, please send it to foia@nara.gov, addressed to the Deputy Archivist, with the words "FOIA

Appeal" in the subject line. Please be certain to explain why you believe this response does not meet the requirements of the Freedom of Information Act. All communications concerning this request should reference FOIA case number 63908.

If you are unable to resolve your dispute through our Public Liaison, the Office of Government Information Services (OGIS) is the federal FOIA ombudsman. OGIS offers mediation services to help resolve disputes between FOIA requesters and federal agencies. You may contact OGIS at the following address:

Office of Government Information Services (OGIS)
National Archives and Records Administration
8601 Adelphi Road, Room 2510
College Park, MD 0740-6001
ogis@nara.gov
202-741-5770
1-877-684-6448

Sincerely,

Dr. Amanda Weimer
Archivist
Special Access and FOIA Staff
<https://www.archives.gov/research/foia>

UNITED STATES FEDERAL COURT

NORTHERN DISTRICT OF IOWA

- FILED JUNE 15th, 2020 -

JUSTIN PAUL SULZNER & ALL TRUE)

MEMBERS IN THE CHRISTIAN)

CONGREGATIONS OF JEHOVAH'S)

WITNESSES (CCJW) & WATCHTOWER)

BIBLE & TRACT SOCIETY INC. (WBTS))

Plaintiff(s))

vs.)

) NO. _____

OFFICE OF DIRECTORS OF NATIONAL)

INTELLIGENCE - UNKNOWN AND)

UNNAMED ASSISTANT)

DIRECTORS & SUBORDINATES (ODNI))

Defendants)

JURISDICTION & VENUE -Fed. R. Civ. P. 8(a) :

1. The Northern District Court of Iowa has jurisdiction of the action (inter alia) under 28 U.S.C. § 1331, 1343, & 1391, and 1402(b) because this is where the events giving rise to this claim occurred.

PLAINTIFFS & DEFENDANTS:

1. Plaintiff, Justin P. Sulzner, a citizen of the United States of America, alleges:

(2) Upon consultation with an attorney, this action may be subject to Federal Rule 23- Class Actions - Federal Rules of Civil Procedures as Plaintiff(s): The true members of the CCJW may be a part of that Class. These individuals are citizens of the U.S and its U.S. Territories.

2. This action is brought against the Assistant Directors of ODNI - Director of United States National Intelligence and 3 of its 17 Agency Assistant-Directors (ODNI), its subordinates, guided community intelligence operatives and any third party organization ODNI may be operating through to enforce the provisions of the Constitution's Bill of Rights - 1st & 14th under Bivens vs. Six Agents -403 U.S. 388 (1971).

4. Plaintiff(s) seek declaratory and injunctive relief pursuant to 28 U.S.C. - Section 2201 & 2202 and/or 28 U.S.C. Section 1346(b) Plaintiff's claims for injunctive relief are authorized by 28 U.S.C. - Section 2283 & 2284 and Rule 65 of the Federal Rules of Civil Procedure.

5. Plaintiff(s) believe the Defendants acted in manners "beyond their official capacities" in order to keep an intelligence community operation secret and viable within ALL CCJW's in the U.S. and its Territories.

5. The Defendants, The Office of Director(s) of National Intelligence ("ODNI"), are senior level federal, governmental agency employees working pursuant to the laws of the Federal Government under 50 U.S.C. - 3023.

6. The Defendant(s) exercised oversight and are legally responsible for a secret program which provides guidance and oversight for the actions of thousands of secret intelligence operatives formed into an "intelligence community" that is currently operating within EVERY SINGLE CCJW's in the U.S. and its Territories, including other additional congregations throughout the world.

7. The Defendant(s) are ODNI sub-Directors and subordinates who have subjected Plaintiff(s) Justin Paul Sulzner, and the true members of the CCJW of which he is a part, to egregious violations of severe mental distress, agony and violation of the Constitution's Bill of Rights- 1st and 14th, associated with free speech, religious freedoms and life, liberty & the pursuit of happiness.

8. The Defendants have assisted and facilitated a predatory intelligence community that victimizes unsuspecting individuals within the CCJW. Through their actions, ODNI has slowly and quietly inducing true members to abandon their faith and Bible based beliefs.

9. All of the Plaintiff(s) are United States citizens and native of the United States and Territories. The Plaintiff(s) have been deprived of their constitutionally protected rights to practice their religious beliefs unhindered, in violation of federal statutes: The Constitution's Bill of Rights -1st & 14 and Bivens vs. Six Agents -403 U.S. 388 (1971).

10. Each suspect ODNI sub- Director and subordinates responsible is sued individually and in his/her official capacity under the color of Federal Law.

FACTS OF COMPLAINT:

(a) Mr. Sulzner currently is and has been an active member of the Jehovah's Witnesses in Iowa for the last 45 years.

(b) With no actual evidence, Mr. Sulzner filed a formal complaint with ACLU in Des Moines, IA around May, 2019 to request an investigation into the following circumstances surrounding the manner in which some "members" were acting within the CCJW's that had attended. Many of these unusual acting "members" and their deeds occurred over several years. Mr. Sulzner began to carefully focus his attention on these "members" in 2016. He suspected, by observing their actions, that some were unquestionably not "right" and quite likely were not true members of the CCJW.

(d) Shortly thereafter, Mr. Sulzner drafted 18 FOIA's (Freedom of Information Act) under (5 U.S.C.- 552) that were directed at the U.S. ODNI agencies that he suspected had a hand in the odd and questionable actions of the religious "members" he had observed over several years. Mr. Sulzner began to suspect with complete confidence that his wife and others close to his family within the local CCJW were involved with this "intelligence community" that is guided, directed, organized and sanctioned by ODNI Assistant Directors under the Head Office of U. S. Intelligence.

(e) After several months, answers from the 18 submitted FOIA's began to pour in. Most federal agencies responded to submitted questions within 60 days with the exception of three : ODNI, CIA, and NSA. Mr. Sulzner drafted a second FOIA request and re-submitted them to the four agencies

that did not respond. (SEE September 10th, 2019 FOIA). Mr. Sulzner is still waiting for a valid response.

(f) One FBI-FOIA indicated there was an **incredibly large cache of well over 13,600 previously top secret documents**, indicating that an active U.S. Intelligence Community that was operating within the CCJW. NARA (National Records & Archives) offered to eventually send the records to Mr. Sulzner for a cost totaling nearly \$11,000, however the documents would not be ready for years, as they were not redacted and NARA has just started to process document requests for the calendar year 2014.

(a) The collective response of the FOIA's revealed that ODNI (formerly CIA & OSS) has unquestionably developed a secret, elaborate, organized intelligence community that has been actively operating within the CCJW since 1921.

(b) Since 1921, ODNI (formerly CIA & OSS) has carefully recruited paid intelligence community individuals (either employees, contractors and/or sub-contractors?) to pose as "real" Jehovah's Witnesses or "interested Bible students" and regularly attend the congregations and scheduled gatherings in their geographical area, posing as "real members" of the CCJW.

(c) The Plaintiff(s) believe there have been thousands of CIA & OSS (now ODNI) recruited operatives since 1921 and that there are currently tens of thousands of these ODNI operatives active within the CCJW in the U.S. and Territories.

(d) These operatives are virtually unrecognizable as impostors within the CCJW. The Plaintiff(s) believe that these ODNI impostors have been regularly and carefully instructed through the years to meticulously follow and obey most CCJW letters of protocol dealing with: (door-to door preaching, weekly scheduled meetings, attending large assemblies) issued by the World Headquarters of Jehovah's Witnesses (now in Warwick, NY)

in order to continuously perpetuate the appearance of stability among the "intelligence members" within the congregation and not to raise suspicion among the true followers attending the local CCJW where they live.

(c) The Plaintiff(s) believe that up to 5 generations of impostor intelligence families have been active within the CCJW for decades. They have regular jobs, they raise their families, they are involved in normal personality conflicts between one another, yet they are paid by ODNI (formerly CIA-OSS) or a third party ODNI organization to maintain appearances of being "God-fearing" established families within the local community and within the CCJW.

(d) The initial goal of this U.S. intelligence community was to investigate the CCJW for treason through the year of 1977. However, after finding nothing treasonous after many decades, the Plaintiff(s) believe the goal of ODNI (formerly CIA-OSS) changed into an operation that used these impostor embedded families & individuals in a capacity that slowly transitioned to undermining and deteriorating the CCJW's true followers from within, with the eventual goal of shutting down the local congregation, selling the Kingdom Hall and ending the door-to-door preaching in that particular locale.

(e) The Plaintiff(s) firmly believe these ODNI impostors have been placed, recommended and appointed to many responsible positions within the CCJW around the world : Publishers , Ministerial Servants (Deacons), Overseers, Circuit Overseers, Branch Overseers, Branch Workers, Legal Dept. and other high positions within the CCJW. These impostors would then be in the best position to influence others and execute critical financial and policy decisions that were not in the best interest of the local CCJW's located throughout the World and the U.S. & its Territories . The intended purpose was to further deteriorate the stability of the congregation.

(f) The Plaintiff(s) have observed over the past two decades some suspect ODNI operatives, who regularly watched pornography, or who had not attended the CCJW regularly for years, or who had beyond disgusting and corrupt moral deficiencies (according to Bible laws), being immediately recommended and appointed to high positions of oversight within the local CCJW by fellow ODNI impostors who were already in place and given positions of authority years before.

(g) ODNI & its sub- Agency Directors and subordinates have failed and refused to provide Plaintiff(s) with the unobstructed opportunities to practice religious beliefs within his local community and within previous communities he resided, because of the disgusting presence of these ODNI established intelligence communities within the five CCJW's he has attended within Iowa during the past 45 years.

(h) The Plaintiff(s) believe all U.S. intelligence communities were directed by ODNI Directors or an ODNI directed/funded third party organization; regularly providing monthly guidance and oversight to their paid local operatives who are currently attending the local CCJW.

(i) The Plaintiff(s) believe ODNI Assistant Directors have failed and refused to take appropriate action to remedy the effects of the discriminatory treatment and severe mental and emotional damage inflicted against the true worshippers within the CCJW.

(j) The Plaintiff(s) believe ODNI Assistant Directors have failed and could have reasonably contemplated that the actions of their intelligence operatives within the CCJW would cause extreme mental anguish to the Plaintiffs as a result of their violations of 1st Amendment and/or intentional torts and/or "breach of contract" associated with protecting Constitutional rights associated with freedom of religion, life, liberty and the pursuit of happiness.

(k) The Plaintiff(s) believe ODNI Assistant Directors failed and could have reasonably contemplated that the actions of their intelligence operatives would cause severe and extreme mental anguish to families being divided because of the actions of family members who were truly not Jehovah's Witnesses; resulting in devastating consequences such as: loss of spousal support, loss of spousal consortium and/or loss of children's affection, loss of family and/or loss of communication with family members.

(l) The Plaintiff(s) firmly believe there have been several instances where true members of the CCJW have committed suicide because they did not comprehend or understand the sinister nature of this secret operation executed by these ODNI intelligence operatives within their local congregation.

LEGAL CLAIMS:

When the Federal Court considers an application to proceed : **First**, the Court "must accept all of the complaint's well-pleaded facts as true." Id. at 210. **Second**, the Court "must then determine whether the facts alleged in the complaint are sufficient to show that the plaintiff has a 'plausible claim for relief.'" Id. at 211 (quoting Iqbal, 129 S. Ct. at 1950). The "plausibility" analysis "will be 'a context-specific task that requires the reviewing court to draw on its judicial experience and common sense.'" Id. (quoting Iqbal, 129 S. Ct. at 1949). .

Due to the complexity and span of duration surrounding this complaint, the Plaintiff(s) believes the closest legal remedy applicable to this legal complaint is either through: The Constitution's Bill of Rights -1st & 14th and/or Bivens vs. Six Agents - 403 U.S. 388 (1971).

This case easily has the potential to possibly extend Bivens to a "new context." Where a "Bivens case" does not present a new context, that is the

end of the analysis and the court does not need to proceed to determine whether there are special factors counseling hesitation against a remedy.

PLAINTIFF(S) COMMON LAW TORT CLAIMS

14 cases under established Iowa Law.

EXHAUSTION OF LEGAL REMEDIES:

1. Plaintiff(s) have not been contacted regarding two submitted SF-95 Forms to the ODNI in mid-April and May, 2020, as the 6 month time limit has not yet passed. An FTCA claim is not yet a consideration.
2. Plaintiff(s) unsuccessfully attempted to contact the Department of Justice in Washington D.C. in March, 2020 and asked for assistance through conciliation voluntary resolution of the charge and subsequently was informed they may not be able to help. (SEE LETTER TO HRSP-FBI WASHINGTON D.C.)
3. All conditions precedent to the filing of suit have been met.

REQUEST FOR RELIEF:

WHEREFORE, the Plaintiff(s) seek to prevent continuing and substantial injury to innocent victims who come into contact with this intelligence community and prays the Iowa Northern District Court to issue judgment granting the Plaintiff(s):

(1) An immediate individual personal service of this complaint by U.S. Marshals to four of the most senior members of the CCJW Governing Body of Jehovah's Witnesses: Gerritt Losch, Samuel Herd, Mark Stephen Lett

and David Splane and the Head of Worldwide Legal Department, Mr. Paul Polidoro.

FURTHER, granting preliminary and permanent injunctions requested, in part , under 5 U.S.C Part 552b - Section f (Injunctive Relief against Federal Agencies) ordering:

(a) All ODNI and/or any ODNI third party intelligence community individuals to immediately cease executing any decisions for the CCJW and/or WBTS and permanently depart and cease from working and residing at the following World Headquarters (in New York) properties controlled by WBTS Inc and/or CCJW: Ramapo, Tuxedo, Warwick, Patterson, Wallkill, Mt. Ebo and any other property in the U.S. not listed within 15 days of the issuing order.

(b) ALL ODNI and/or ODNI third party intelligence community individuals to immediately cease executing any decisions for the CCJW and/or WBTS and permanently depart and vacate any local state CCJW's they are/had attended during the past 25 years and cease providing any further congregational "direction or guidance" personally, via phone, or via computer to any true members remaining within those congregations in all 50 states and Territories throughout the United States within 15 days of the issuing order.

(c) NARA, NSA, CIA and ODNI to immediately provide for public consideration and interest, at no cost, and in detail, all unredacted FOIA document information requests submitted on September 10th, 2019, February 20th, 2020, February 23rd, 2020 and April 16th,2020.

The Plaintiff(s) have no plain, adequate, or straightforward remedy at law to redress the wrongs described herein. Plaintiff(s) have been and will continue to be irreparably harmed because of the malicious and egregious conduct of the Defendants established U.S. intelligence communities within

the CCJW's, unless this Court grants the declaratory and/or injunctive relief the Plaintiff(s) seek.

Damages:

(a) Plaintiff(s) will be requesting substantial compensatory damages for the injuries caused by the actions of ODNI sub-directors, subordinates and intelligence community individuals discriminatory conduct within the CCJW pursuant to and within the statutory limitations of The Constitution's Bill of Rights - 1st and 14th and/or Bivens vs. Six Agents- 403 U.S. 388 (1971).

(b) Take other appropriate nondiscriminatory measures to overcome the effects of the discrimination and any future discriminatory actions that may occur.

(c) Costs associated with Plaintiff(s) attorneys and the filing of this suit.

(d) The plaintiff prays for such additional relief as justice may require, together with proper and equitable costs/ disbursements in this action.

JURY DEMAND

The Plaintiff(s) hereby requests a trial by jury of all issues so triable pursuant to Rule 38 of the Federal Rules of Civil Procedure and Section 102 of the Civil Rights Act of 1991, 42 U.S.C. Upon consultation with an attorney, that request may be withdrawn for consideration by a District Judge only.

VERIFICATION

I have read the foregoing complaint and hereby verify that the matters alleged therein are true, except as to matters alleged on information and belief, and, as to those I believe them to be true. I certify under the penalty of perjury that the foregoing is true and correct.

Respectfully submitted-

Dated: JUNE 15th, 2020

[S] Justin P. Sulzner

Justin P. Sulzner - Attorney Pro Se
1834 First Avenue - #104
Cedar Rapids, Iowa 52402
Telephone: 319-213-7608
Email: justinsulzner@gmail.com

Certificate of Service I hereby certify under Rule 5(c) that a copy of the foregoing was mailed within 90 days to ODNI - U.S. Intelligence at Washington D.C. 20511 on:

June 15, 2020. [S] Justin P. Sulzner Justin Paul Sulzner